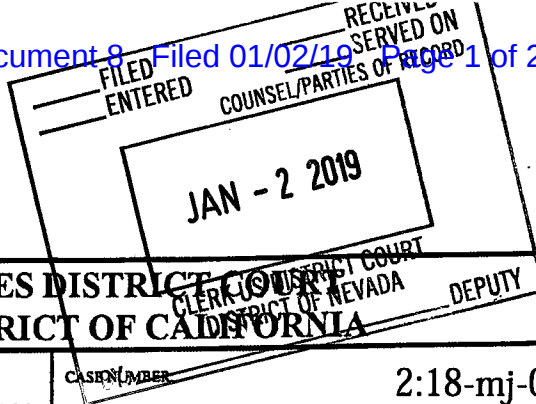


1409974



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

United States of America

Plaintiff(s)

2:18-mj-0988-PAL

CR 07-01268

v.

ALFONSO BERNAL BARRON

Defendant(s)

WARRANT FOR ARREST

TO: UNITED STATES MARSHAL AND ANY AUTHORIZED UNITED STATES OFFICER

YOU ARE HEREBY COMMANDED to arrest ALFONSO BERNAL BARRONand bring him/her forthwith to the nearest Magistrate Judge to answer a(n): ☐ Complaint ☒ Indictment☐ Information ☐ Order of Court ☐ Probation Violation Petition ☐ Violation Notice

charging him/her with: (ENTER DESCRIPTION OF OFFENSE BELOW)

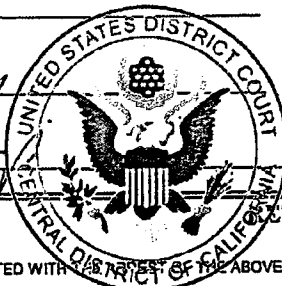
Conspiracy to Possess with Intent to Distribute and to Distribute Cocaine
Possession with Intent to Distribute Cocaine

in violation of Title 21: United States Code, Section(s) 846:841(a)(1), (b)(1)(B):

Sherri R. Carter
NAME OF ISSUING OFFICER

Clerk of Court
TITLE OF ISSUING OFFICER

SIGNATURE OF DEPUTY CLERK



November 14, 2007 LOS ANGELES, CALIFORNIA
DATE AND LOCATION OF ISSUANCE

BY: VICTOR B. KENTON
NAME OF JUDICIAL OFFICER

THIS WARRANT WAS RECEIVED AND EXECUTED WITH THE ARREST OF THE ABOVE-NAMED DEFENDANT AT (LOCATION):

DATE RECEIVED

NAME OF ARRESTING OFFICER

DATE OF ARREST

TITLE

DESCRIPTIVE INFORMATION FOR DEFENDANT
CONTAINED ON PAGE TWO

SIGNATURE OF ARRESTING OFFICER

WARRANT FOR ARREST

CR-12 (07/04)

PAGE 1 OF 2

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ORIGINAL

2:18-mj-0988-PAL CASE SUMMARY

Case Number 07-U1268 Defendant Number 8
 U.S.A. v. ALFONSO BERNAL BARRON Year of Birth 1965
☒ Indictment ☐ Information Investigative agency (FBI, DEA, etc.) DEA

NOTE: All items are to be completed. Information not applicable or unknown shall be indicated as "N/A"

OFFENSE/VENUE

- a. Offense charged as a: ☐ Petty Offense
☐ Misdemeanor ☐ Minor Offense ☒ Felony
 b. Date of offense 8/7/06-7/11/07, 8/16/07-8/29/07, 11/07
 c. County in which first offense occurred
Los Angeles
 d. The crimes charged are alleged to have been committed in:
 CHECK ALL THAT APPLY

- ☒ Los Angeles ☐ Ventura
☐ Orange ☐ Santa Barbara
☐ Riverside ☐ San Luis Obispo
☐ San Bernardino ☐ Other _____

Citation of offense 21 U.S.C. 846, 21 U.S.C. 841(a)(1),
(b)(1)(A), (b)(1)(B)

RELATED CASE

Has an indictment or information involving this defendant and the same transaction or series of transactions been previously filed and dismissed before trial? ☒ No ☐ Yes

IF YES Case Number _____

Pursuant to Section 11 of General Order 224, criminal cases may be related if a previously filed indictment or information and the present case:

- a. arise out of the same conspiracy, common scheme, transaction, series of transactions or events; or
 b. involve one or more defendants in common, and would entail substantial duplication of labor in pretrial, trial or sentencing proceedings if heard by difference judges.

Related case(s), if any: MUST MATCH NOTICE OF RELATED CASE CR No. 07-522-ER

PREVIOUSLY FILED COMPLAINT

A complaint was previously filed on: 10/31/07
 Case Number 07-1844M
 Charging 21 U.S.C. 846

The complaint: ☒ is still pending
☐ was dismissed on: _____

COMPLEX CASE

Are there 8 or more defendants in the Indictment/Information?

☒ Yes* ☐ No

Will more than 12 days be required to present government's evidence in the case-in-chief?

☒ Yes* ☐ No

*AN ORIGINAL AND 3 COPIES OF THE NOTICE OF COMPLEX CASE MUST BE FILED 2 BUSINESS DAYS BEFORE THE ARRAIGNMENT IF EITHER YES BOX IS CHECKED.

Superseding Indictment/InformationThis is the _____ superseding charge, i.e. 1st, 2nd.

The superseding case was previously filed on: _____

Case Number _____

The superseded case:

☐ is still pending before Judge/Magistrate Judge☐ was previously dismissed on _____

Are there 8 or more defendants in the superseding case?

☐ Yes* ☐ No

Will more than 12 days be required to present government's evidence in the case-in-chief?

☐ Yes* ☐ No

Was a Notice of Complex Case filed on the Indictment or Information?

☐ Yes ☐ No

*AN ORIGINAL AND 3 COPIES OF THE NOTICE OF COMPLEX CASE MUST BE FILED 2 BUSINESS DAYS BEFORE THE ARRAIGNMENT IF EITHER YES BOX IS CHECKED.

Is an interpreter required: ☒ Yes ☐ No

IF YES, list language and/or dialect:

Spanish

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CASE SUMMARY

OTHER

☒ Male ☐ Female
☒ U.S. Citizen ☐ Alien
 Alias Name(s) _____

This defendant is charged in: ☐ All counts
☒ Only counts: 1, 2, 4
☐ This defendant is designated as "High Risk" per
 18 USC 3146(a)(2) by the U.S. Attorney.
☐ This defendant is designated as "Special Case"
 per 18 USC 3166(b)(7).

Is defendant a juvenile? ☐ Yes ☒ No
 IF YES, should matter be sealed? ☐ Yes ☐ No

The area of substantive law that will be involved in this case
 includes:

<input type="checkbox"/> financial institution fraud	<input type="checkbox"/> public corruption
<input type="checkbox"/> government fraud	<input type="checkbox"/> tax offenses
<input type="checkbox"/> environmental issues	<input type="checkbox"/> mail/wire fraud
<input checked="" type="checkbox"/> narcotics offenses	<input type="checkbox"/> immigration offenses
<input type="checkbox"/> violent crimes/firearms	<input type="checkbox"/> corporate fraud
<input type="checkbox"/> Other: _____	

CUSTODY STATUSDefendant is not in custody:

a. Date and time of arrest on complaint: _____
 b. Posted bond at complaint level on: _____
 in the amount of \$ _____
 c. PSA supervision? ☐ Yes ☐ No
 d. Is a Fugitive ☒ Yes ☐ No
 e. Is on bail or release from another district: _____
 f. ☐ Has not been arrested but will be notified by summons
 to appear.
 g. Warrant requested. ☒ Yes ☐ No

Defendant is in custody:

a. Place of incarceration: ☐ State ☐ Federal
 b. Name of Institution: _____
 c. If Federal: U.S. Marshal's Registration Number: _____
 d. ☐ Solely on this charge. Date and time of arrest: _____
 e. On another conviction: ☐ Yes ☐ No
 IF YES ☐ State ☐ Federal ☐ Writ of Issue
 f. Awaiting trial on other charges: ☐ Yes ☐ No
 IF YES ☐ State ☐ Federal AND
 Name of Court: _____

Date transferred to federal custody: _____

This person/proceeding is transferred from another district
 pursuant to F.R.CrP. ____ 20 ____ 21 ____ 400

EXCLUDABLE TIME

Determinations as to excludable time prior to filing indictment/information EXPLAIN: _____

Date November 13, 2007


 Signature of Assistant U.S. Attorney

BONNIE L. HOBBS

Print Name

FILED

2007 NOV 14 PM 2:48

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2007 Grand Jury 2:18-mj-0988-PAL

UNITED STATES OF AMERICA,
Plaintiff,
v.

CR No. 07- **07-01268**I N D I C T M E N T

ALI KHALIL ELREDA,
EPIFANIO MERCADO,
ROBERT BELL,
RICARDO NAVA,
JUAN JOSE GALINDO,
JUAN MANUEL GONZALEZ,
FRANCISCO HIGUERA, JR.,
ALFONSO BERNAL BARRON, and
DALISA JOHNSON,
Defendants.

[21 U.S.C. § 846: Conspiracy
to Possess with Intent to
Distribute and to Distribute
Cocaine; 21 U.S.C.
§§ 841(a)(1), (b)(1)(A),
(b)(1)(B): Possession with
Intent to Distribute Cocaine;
21 U.S.C. §§ 841(a)(1),
(b)(1)(A): Possession with
Intent to Distribute
Methamphetamine]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

A. OBJECTS OF THE CONSPIRACY

Beginning on or about August 7, 2006, and continuing to at
least July 11, 2007, in Los Angeles County, within the Central
District of California, and elsewhere, defendants ALI KHALIL
ELREDA ("ELREDA"), EPIFANIO MERCADO ("MERCADO"), ROBERT BELL

1 ("BELL"), RICARDO NAVA ("NAVA"), JUAN JOSE GALINDO ("GALINDO"),
2 JUAN MANUEL GONZALEZ ("GONZALEZ"), FRANCISCO HIGUERA, JR.
3 ("HIGUERA"), and DALISA JOHNSON ("JOHNSON"), and others known and
4 unknown to the Grand Jury, conspired and agreed with each other
5 to knowingly and intentionally

6 (a) possess with intent to distribute and

7 (b) distribute

8 more than 5 kilograms of cocaine, a Schedule II narcotic drug
9 controlled substance, in violation of Title 21, United States
10 Code, Section 841(a)(1).

11 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
12 ACCOMPLISHED

13 The objects of the conspiracy were to be accomplished in
14 substance as follows:

15 1. Defendant ELREDA would introduce defendant MERCADO to
16 defendant BELL for the purpose of negotiating the sale of
17 multiple kilograms of cocaine by defendant MERCADO to defendant
18 BELL.

19 2. Defendant MERCADO would supply defendant BELL with
20 multiple kilograms of cocaine, which defendant BELL would sell to
21 his drug customers.

22 3. Defendant NAVA would transport multiple kilograms of
23 cocaine for defendant MERCADO.

24 4. Defendants GALINDO, GONZALEZ, and HIGUERA also would
25 supply multiple kilograms of cocaine to defendant BELL, which
26 defendant BELL would sell to his drug customers.

27 5. Defendant JOHNSON would assist defendant BELL in his
28 purchase of multiple kilograms of cocaine from defendant MERCADO

1 by conducting counter-surveillance for defendant BELL and
2 defendant NAVA.

3 C. OVERT ACTS

4 In furtherance of the conspiracy and to accomplish the
5 objects of the conspiracy, defendants, and others known and
6 unknown to the Grand Jury, committed various overt acts on or
7 about the following dates, within the Central District of
8 California and elsewhere, including but not limited to the
9 following:

10 1. On August 7, 2006, in a telephone conversation and
11 using coded language, defendant ELREDA told defendant MERCADO
12 that defendant ELREDA would take money from defendant BELL, and
13 defendant ELREDA would call defendant MERCADO so that defendant
14 MERCADO could pick it up the next day.

15 2. On August 7, 2006, in a telephone conversation and
16 using coded language, defendant ELREDA told defendant MERCADO
17 that defendant BELL wanted five kilograms of cocaine, that
18 defendant MERCADO eventually would deliver ten or fifteen
19 kilograms of cocaine to defendant BELL, and that defendant
20 MERCADO could deliver the cocaine to defendant BELL on defendant
21 ELREDA's behalf.

22 3. On August 7, 2006, in a telephone conversation and
23 using coded language, defendant ELREDA asked defendant BELL how
24 much cocaine defendant BELL needed, and defendant BELL told
25 defendant ELREDA that defendant BELL wanted five kilograms of
26 cocaine.

27 4. On August 7, 2006, in a telephone conversation and
28 using coded language, defendant ELREDA told defendant MERCADO

1 that defendant BELL wanted five kilograms of cocaine that day,
2 and that defendant BELL would want up to fifteen kilograms of
3 cocaine at later times.

4 5. On August 7, 2006, in telephone conversations and
5 using coded language, defendant ELREDA asked defendant MERCADO
6 what the price for the cocaine would be if defendant BELL paid
7 defendant MERCADO for the cocaine today, and defendant MERCADO
8 answered \$12,300 per kilogram.

9 6. On August 7, 2006, in a telephone conversation and
10 using coded language, defendant ELREDA told defendant BELL to
11 drop \$100 off the price of each kilogram of cocaine.

12 7. On August 7, 2006, in a telephone conversation and
13 using coded language, defendant BELL told defendant ELREDA
14 that if the cocaine was good, defendant BELL would buy ten
15 kilograms of cocaine from defendant MERCADO.

16 8. On August 7, 2006, in a telephone conversation and
17 using coded language, defendant ELREDA told defendant MERCADO
18 that if the cocaine was good, defendant BELL would pay for ten
19 kilograms of cocaine right now, and defendant MERCADO said that
20 he would call defendant ELREDA to tell defendant ELREDA that the
21 cocaine was ready.

22 9. On August 15, 2006, in a telephone conversation and
23 using coded language, defendant ELREDA and defendant MERCADO
24 discussed defendant MERCADO continuing to sell high quality
25 cocaine to defendant BELL.

26 10. On August 24, 2006, in a telephone conversation and
27 using coded language, defendant ELREDA and defendant BELL
28 discussed the price that defendant MERCADO charged defendant BELL

1 for kilograms of cocaine.

2 11. On October 5, 2006, in a telephone conversation
3 and using coded language, defendant ELREDA and defendant BELL
4 discussed defendant BELL continuing to conduct cocaine
5 transactions with defendant MERCADO.

6 12. On October 31, 2006, in a telephone conversation and
7 using coded language, defendant BELL told defendant MERCADO that
8 a drug customer in Tennessee was going to pay \$15,500 per
9 kilogram of cocaine.

10 13. On October 31, 2006, in a telephone conversation and
11 using coded language, defendant BELL told defendant MERCADO that
12 defendant BELL was selling twenty to twenty-five kilograms of
13 cocaine per week, and that defendant BELL was waiting on someone
14 who wanted to purchase another ten kilograms.

15 14. On October 31, 2006, in a telephone conversation and
16 using coded language, defendant MERCADO told defendant BELL that
17 defendant MERCADO would be out of town, and that his cousin,
18 defendant NAVA, would be available the next day to deliver eight
19 kilograms of cocaine that defendant MERCADO had, and that if
20 defendant BELL wanted them, he would sell them all to defendant
21 BELL.

22 15. On November 1, 2006, in a telephone conversation and
23 using coded language, defendant NAVA told defendant BELL that
24 defendant NAVA had eight kilograms of cocaine.

25 16. On November 1, 2006, in telephone conversations and
26 using coded language, defendant BELL and defendant NAVA discussed
27 the location for their drug deal and the presence of a police
28 car.

1 17. On November 1, 2006, in a telephone conversation and
2 using coded language, defendant JOHNSON told defendant BELL that
3 she did not think that defendant NAVA should come into the
4 parking lot because of the police.

5 18. On November 1, 2006, defendant BELL, driving a gold
6 Toyota Camry, and defendant NAVA, driving a white Toyota Camry
7 that contained eight kilograms of cocaine, entered the parking
8 lot of a Staples store in Bellflower, California, where both of
9 them parked their cars.

10 19. On November 1, 2006, defendant BELL got out of his car
11 and entered defendant NAVA's car with the eight kilograms of
12 cocaine.

13 20. On November 1, 2006, defendant NAVA left the parking
14 lot in his white Toyota Camry, after which the eight kilograms of
15 cocaine was seized by law enforcement officers in Bellflower,
16 California.

17 21. On November 1, 2006, in a telephone conversation and
18 using coded language, defendant ELREDA asked defendant BELL if
19 the police were holding the cocaine that defendant NAVA had had
20 in his car, and defendant BELL said yes.

21 22. On November 1, 2006, in a telephone conversation and
22 using coded language, defendant ELREDA told defendant BELL that
23 defendant MERCADO had told defendant ELREDA that defendant
24 MERCADO had eight or ten kilograms of cocaine left and wanted to
25 get rid of them.

26 23. On November 1, 2006, in a telephone conversation and
27 using coded language, defendant BELL told defendant ELREDA that
28 defendant NAVA had called defendant MERCADO and had told

1 defendant MERCADO to call defendant BELL to get rid of defendant
2 MERCADO's remaining eight or ten kilograms of cocaine.

3 24. On November 1, 2006, in a telephone conversation and
4 using coded language, defendant MERCADO told an associate of
5 defendant ELREDA that defendant MERCADO would kill defendant
6 ELREDA's associate if he did not give defendant MERCADO defendant
7 ELREDA's telephone number.

8 25. On November 1, 2006, in a telephone conversation and
9 using coded language, defendant ELREDA told defendant MERCADO
10 that defendant NAVA had been arrested, and gave defendant MERCADO
11 defendant BELL's telephone number because defendant BELL had seen
12 everything.

13 26. On November 1, 2006, in a telephone conversation and
14 using coded language, defendant ELREDA told defendant BELL that
15 defendant MERCADO was looking for defendant BELL, and that
16 defendant MERCADO would rip off defendant BELL if the police came
17 after defendant MERCADO.

18 27. On November 4, 2006, in a telephone conversation and
19 using coded language, defendant ELREDA asked defendant BELL the
20 price for one kilogram of cocaine, and defendant BELL said
21 \$13,000 per kilogram, but that defendant ELREDA should charge
22 defendant ELREDA's drug customer \$13,500 per kilogram.

23 28. On November 4, 2006, in a telephone conversation and
24 using coded language, defendant ELREDA informed his drug
25 customer that the price for one kilogram of cocaine was \$14,000,
26 and that defendant BELL was providing a sample of cocaine to show
27 to the drug customer.

28 29. On November 29, 2006, defendants BELL and MERCADO

1 traveled with others from Los Angeles, California, to Nashville,
2 Tennessee for purposes of a drug deal.

3 30. On December 1, 2006, defendant BELL took possession
4 of approximately one kilogram of cocaine, \$302,190 in United
5 States currency, and miscellaneous drug packaging materials at
6 2211 Ladd Street, Clarksville, Tennessee, which subsequently was
7 seized by law enforcement officers.

8 31. On December 3, 2006, in telephone conversations and
9 using coded language, defendant ELREDA and defendant BELL
10 discussed the police seizing the cocaine from defendant NAVA.

11 32. On December 3, 2006, in telephone conversations and
12 using coded language, defendant ELREDA told defendant BELL that
13 defendant ELREDA may not want to do business with defendant BELL
14 any more, because defendant BELL may be watched by law
15 enforcement, and defendant ELREDA told defendant BELL to talk to
16 defendant MERCADO.

17 33. On December 9, 2006, an unindicted co-conspirator
18 transported approximately twenty kilograms of cocaine in
19 Wabaunsee County, Kansas, in his truck.

20 34. On December 16, 2006, in a telephone conversation and
21 using coded language, defendant MERCADO asked defendant GONZALEZ
22 if defendant GONZALEZ had spoken to defendant BELL.

23 35. On December 16, 2006, in a telephone conversation and
24 using coded language, defendant GONZALEZ told defendant MERCADO
25 that defendant GONZALEZ had not spoken much to defendant BELL,
26 but that defendant GALINDO spoke to defendant BELL more because
27 GALINDO could provide forty to eighty kilograms of cocaine to
28 defendant BELL at a time.

1 36. On December 16, 2006, in a telephone conversation and
2 using coded language, defendant GONZALEZ told defendant MERCADO
3 that defendant GONZALEZ had provided twenty kilograms of cocaine
4 to defendant BELL before.

5 37. On December 27, 2006, in a telephone conversation and
6 using coded language, defendant ELREDA asked a source for
7 kilograms of cocaine, because defendant ELREDA had a guy who
8 wanted a couple of kilograms right now, and the source said he
9 would check.

10 38. On December 27, 2006, in a telephone conversation and
11 using coded language, defendant ELREDA told the source for
12 cocaine, at the direction of defendant BELL, that he wanted
13 twenty kilograms of cocaine right now.

14 39. On February 1, 2007, in a telephone conversation and
15 using coded language, defendant BELL told defendant GONZALEZ that
16 defendant BELL needed thirteen kilograms of cocaine, and
17 defendant GONZALEZ said he would call to see if he could get it.

18 40. On February 1, 2007, in a telephone conversation and
19 using coded language, defendant GONZALEZ told defendant BELL that
20 a supplier had ten kilograms of cocaine and defendant GONZALEZ
21 had two kilograms of cocaine.

22 41. On February 1, 2007, in a telephone conversation and
23 using coded language, defendant GONZALEZ asked defendant BELL if
24 they were going to meet at a restaurant.

25 42. On February 1, 2007, defendant GONZALEZ transported
26 \$95,000 in United States currency in the trunk of his Mercedes-
27 Benz in Compton, California, which currency was subsequently
28 seized by law enforcement officers.

1 43. On February 2, 2007, in a telephone conversation and
2 using coded language, defendant GONZALEZ told defendant BELL how
3 the Los Angeles County Sheriffs followed defendant GONZALEZ and
4 took the money.

5 44. On February 22, 2007, in a telephone conversation
6 and using coded language, defendant MERCADO told defendant
7 ELREDA that defendant BELL had alerted law enforcement that
8 defendant NAVA and the unindicted co-conspirator had been
9 transporting cocaine in their vehicles.

10 45. On March 30, 2007, defendant GALINDO maintained
11 possession, at his residence in Maywood, California, of
12 approximately 300 grams of cocaine, approximately \$74,227 in
13 United States currency, a Royal Sovereign Cash Counting Machine,
14 a calculator, and miscellaneous materials for packaging kilograms
15 of cocaine.

16 46. On April 2, 2007, in a telephone conversation and using
17 coded language, defendant BELL told an unindicted co-conspirator
18 that defendant GALINDO had been busted by the police for cocaine
19 and narcotics proceeds possession, and that defendant GONZALEZ
20 had been put in jail after being caught with money.

21 47. On April 4, 2007, in a telephone conversation and using
22 coded language, defendant BELL asked defendant ELREDA if someone
23 could supply defendant BELL with cocaine, and defendant ELREDA
24 said that he had been making telephone calls, but there was no
25 one available.

26 48. On April 11, 2007, in a telephone conversation and
27 using coded language, defendant BELL told defendant ELREDA that
28 defendant BELL wanted to purchase cocaine.

1 49. On April 11, 2007, in a telephone conversation and
2 using coded language, defendant ELREDA told defendant BELL that
3 defendant ELREDA wanted about ten kilograms of cocaine per week
4 to ship to New York.

5 50. On April 11, 2007, in a telephone conversation and
6 using coded language, defendant ELREDA gave defendant BELL the
7 telephone number for a source of multiple kilograms of cocaine.

8 51. On April 11, 2007, in a telephone conversation and
9 using coded language, defendant BELL told defendant ELREDA that
10 the source of cocaine said that the price was \$18,000 or \$19,000
11 per kilogram in New York, but that defendant BELL's people got
12 \$25,000 per kilogram.

13 52. On June 26, 2007, in a telephone conversation and
14 using coded language, defendant GALINDO told defendant BELL
15 that the price of a kilogram of cocaine would be \$15,500, and
16 defendant BELL told defendant GALINDO that defendant BELL would
17 pass for now.

18 53. On June 26, 2007, in a telephone conversation and using
19 coded language, defendant BELL and defendant HIGUERA discussed
20 defendant HIGUERA supplying a kilogram of cocaine to defendant
21 BELL, and defendant BELL inspecting the cocaine to ensure that it
22 was good quality.

23 54. On June 27, 2007, in telephone conversations and using
24 coded language, defendant BELL and defendant HIGUERA discussed
25 defendant HIGUERA supplying additional kilograms of cocaine to
26 defendant BELL.

27 55. On June 28, 2007, in telephone conversations and using
28 coded language, defendant BELL and defendant HIGUERA discussed

1 defendant HIGUERA waiting to receive the additional cocaine that
2 he would deliver to defendant BELL.

3 56. On June 29, 2007, in a telephone conversation and using
4 coded language, defendant HIGUERA told defendant BELL that
5 defendant HIGUERA might be able to get two, or perhaps as many as
6 five, kilograms of cocaine for defendant BELL.

7 57. On July 10, 2007, in telephone conversations and using
8 coded language, defendant GALINDO and defendant BELL discussed
9 defendant GALINDO delivering cocaine to defendant BELL on
10 Thursday.

11 58. On July 11, 2007, in a telephone conversation and using
12 coded language, defendant HIGUERA told defendant BELL that the
13 price of cocaine would be \$15,800 per kilogram, and defendant
14 BELL told defendant HIGUERA that defendant GALINDO provided
15 cocaine to defendant BELL at \$14,800 per kilogram every week.

COUNT TWO

[21 U.S.C. § 846]

A. OBJECTS OF THE CONSPIRACY

Beginning on or about August 16, 2007, and continuing to at least August 29, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendants FRANCISCO HIGUERA, JR. ("HIGUERA") and ALFONSO BERNAL BARRON ("BARRON"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally

(a) possess with intent to distribute and

(b) distribute

more than 500 grams of cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished in substance as follows:

1. Defendant HIGUERA would supply multiple kilograms of cocaine to his drug customers.

2. Defendant BARRON would assist defendant HIGUERA by transporting multiple kilograms of cocaine for defendant HIGUERA's drug customers.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, defendants, and others known and unknown to the Grand Jury, committed various overt acts on or about the following dates, within the Central District of

1 California and elsewhere, including but not limited to the
2 following:

3 1. On June 26, 2007, in a telephone conversation and using
4 coded language, defendant HIGUERA and a drug customer discussed
5 defendant HIGUERA supplying a kilogram of cocaine to the drug
6 customer, and the drug customer inspecting the cocaine to ensure
7 that it was good quality.

8 2. On June 27, 2007, in telephone conversations and using
9 coded language, defendant HIGUERA and a drug customer discussed
10 defendant HIGUERA supplying additional kilograms of cocaine to
11 the drug customer.

12 3. On June 28, 2007, in telephone conversations and using
13 coded language, defendant HIGUERA and a drug customer discussed
14 defendant HIGUERA waiting to receive the additional cocaine that
15 he would deliver to the drug customer.

16 4. On June 29, 2007, in a telephone conversation and using
17 coded language, defendant HIGUERA told a drug customer that
18 defendant HIGUERA might be able to get two, or perhaps as many as
19 five, kilograms of cocaine for the drug customer.

20 5. On July 11, 2007, in a telephone conversation and using
21 coded language, defendant HIGUERA told a drug customer that the
22 price of cocaine would be \$15,800 per kilogram.

23 6. On August 16, 2007, in telephone conversations and
24 using coded language, defendant HIGUERA and defendant BARRON
25 discussed picking up seven kilograms of cocaine from defendant
26 HIGUERA's cocaine supplier.

27 7. On August 29, 2007, defendant BARRON, followed by
28 defendant HIGUERA in a separate vehicle, transported

1 approximately three kilograms of cocaine in his car in Lynwood,
2 California, for delivery to defendant HIGUERA's drug customer,
3 which cocaine was seized by law enforcement officers.
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COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)]

On or about November 1, 2006, in Los Angeles County, within the Central District of California, and elsewhere, defendants ROBERT BELL and RICARDO NAVA knowingly and intentionally possessed with intent to distribute approximately eight kilograms of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)]

On or about August 29, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendants FRANCISCO HIGUERA, JR. and ALFONSO BERNAL BARRON knowingly and intentionally possessed with intent to distribute approximately three kilograms of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)]

On or about November 6, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendant JUAN MANUEL GONZALEZ knowingly and intentionally possessed with intent to distribute more than five hundred grams, namely, approximately six hundred grams, of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

A TRUE BILL

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FOREPERSON

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United States Attorney

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